

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TEYO JOHNSON,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Case No. 1:22-cv-06669(PAE)(GWG)
	:	
EVERYREALM INC., COMPOUND ASSET	:	
MANAGEMENT LLC, REALM METAVERSE	:	<u>DEFENDANTS EVERYREALM</u>
REAL ESTATE INC., REPUBLIC, REPUBLIC	:	<u>INC. (f/k/a REPUBLIC REALM</u>
CRYPTO LLC, REPUBLIC REALM MANAGER	:	<u>INC.), JULIA SCHWARTZ, AND</u>
LLC, REPUBLIC REALM INC., REPUBLIC	:	<u>JANINE YORIO’S NOTICE OF</u>
OPERATIONS LLC, OPENDEAL INC.,	:	<u>MOTION TO COMPEL</u>
OPENDEAL PORTAL LLC, JULIA SCHWARTZ	:	<u>ARBITRATION</u>
in her individual and professional capacities, and	:	
JANINE YORIO in her individual and professional	:	
capacities.	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE THAT Defendants Everyrealm Inc. (f/k/a Republic Realm Inc.), Julia Schwartz, and Janine Yorio (collectively “the Everyrealm Defendants”) shall, upon Plaintiff Teyo Johnson’s (“Plaintiff”) Complaint; the Declaration of William Kerr, and the exhibits attached thereto; the Declaration of Lloyd B. Chinn, and the exhibit attached thereto; and the Everyrealm Defendants’ Memorandum of Law; all filed herewith, move this Court, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on such date and time as the Court may direct, for an Order pursuant to Federal Rules of Civil Procedure (“FRCP”) 12(b)(1) and the Federal Arbitration Act, 9 U.S.C. §§ 3, 4: (i) dismissing the action against the Everyrealm Defendants because all claims, excluding any that may be subject to the Ending Forced Arbitration of Sexual Assault and Sexual Harassment Act (“the EFASASH Act”), contained in the Complaint are subject to arbitration under a valid arbitration agreement; (ii) compelling Plaintiff Teyo Johnson to arbitrate the claims, excluding

any that may be subject to the EFASASH Act, asserted in his Complaint against the Everyrealm Defendants pursuant to the arbitration provision contained within his employment agreement; and (iii) staying the remainder of this action against the Everyrealm Defendants pending resolution of the arbitration between the parties.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Local Rule 6.1(b) of the United States District Court for the Southern District of New York, any opposing declarations or answering memoranda must be served on or before September 2, 2022, and reply declarations and memoranda must be served on or before September 9, 2022.

Dated: New York, New York
August 19, 2022

PROSKAUER ROSE LLP

By: /s/ Lloyd B. Chinn

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Realm Inc.), Julia Schwartz, and Janine Yorio*